

1 PHILLIP A. TALBERT
United States Attorney
2 MATHEW W. PILE
Associate General Counsel
3 Office of Program Litigation, Office 7
Oscar Gonzalez de Llano
4 Special Assistant United States Attorney
Social Security Administration
5 160 Spear Street, Suite 800
San Francisco, CA 94105
6 Telephone: (510) 970-4818
Email: Oscar.Gonzalez@ssa.gov
7 Attorneys for Defendant

8
9
10
11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 LAWRENCE WILLIAM THOMPSON,
14 JR.,
15 Plaintiff,
16 v.
17 KILOLO KIJAKAZI,
18 Acting Commissioner of Social Security,
19 Defendant.

No. 2:22-cv-00687-AC

STIPULATED MOTION AND [PROPOSED]
ORDER FOR AN EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S OPENING
BRIEF

20
21 IT IS HEREBY STIPULATED, by and between the parties through their respective
22 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
23 Opening Brief be extended thirty-two days (32) days from October 17, 2022, to November 18,
24 2022. This is Defendant's first request for an extension. Counsel for Plaintiff has no objection to
25 Defendant's request for an extension.

26 Good cause exists for this request. Defendant respectfully requests this additional time
27 because Counsel for Defendant has and will be unable to devote the time required to complete its
28

1 response. Counsel for Defendant currently has five (5) merit briefs currently due in district court
2 cases in the next seven (7) days and fifteen (15) merit briefs in the next thirty (30) days. Given
3 this current workload and leave schedule an extension until November 18, 2022 should provide
4 an opportunity for the undersigned Counsel for Defendant to prioritize completing the response to
5 Plaintiff's Opening Brief. Furthermore, a reassignment of this matter to another staff attorney is
6 currently not tenable given the high volume of cases that all of our limited staff (due to leave and
7 resignations) is handling. Counsel apologizes to the Court for any inconvenience caused by this
8 delay. All other dates in the Court's Scheduling Order shall be extended accordingly.

9
10 Respectfully submitted,

11 PHILLIP A. TALBERT
12 United States Attorney

13 DATE: October 14, 2022

14 By: s/ Oscar Gonzalez de Llano
15 OSCAR GONZALEZ DE LLANO
16 Special Assistant United States Attorney
17 Attorneys for Defendant

18
19 Respectfully submitted,

20 Attorney for Plaintiff

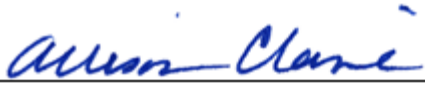
21
22 DATE: October 14, 2022

23 By: s/ Stuart Barasch *
24 Stuart Barasch
25 Law Offices of Stuart Barasch
26 (*as authorized by email)
27
28

ORDER

Pursuant to Defendant's Motion, IT IS SO ORDERED that Defendant shall have an extension, up to and including November 18, 2022, to respond to Plaintiff's Opening Brief.

DATED: October 17, 2022



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE